

SOLOMON E. GRESEN, ESQ. (SBN 164783)
RGLAWYERS, LLP
16200 Ventura Blvd., Suite 407A
Encino CA 91436
Tel: (818) 815-2737
Fax: (818) 815-2737
seg@rglawyers.com

JASON M. INGBER, ESQ. (SBN 318323)
Law Offices of Jason M. Ingber
3580 Wilshire Blvd., Suite 1260
Los Angeles, CA 90010
Tel: (310) 270-0089
jasonmingber@gmail.com

Attorneys for Plaintiff, Andrea Love

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ANDREA LOVE, an individual,

Plaintiff,

vs.

ELLEN STONE, an individual; and DOES 1
through 25, inclusive

Defendants.

Case No.: 2:23-cv-3122

**COUNSEL JASON M. INGBER'S
DECLARATION IN SUPPORT OF EX
PARTE APPLICATION TO CORRECT
FILING OF AN UNREDACTED MOTION**

(28 U.S.C.S. §1447(c))

Complaint Filed: 2.28.2023
LASC Case No.: 23STCV04399

1. I, Jason M. Ingber, work for RGLaywers LLP and Solomon Gresen, am co-counsel for Plaintiff for this matter and if called upon to testify could and would testify to the following under the penalty of perjury.

2. Plaintiff filed this Action in Los Angeles Superior Court on February 28, 2023. On or about May 12, 2023, I spoke with Defendant's counsel over the phone regarding our overall perspectives to this case, a roadmap to resolution and that Plaintiff plans to challenge

1 Defendant's removal on the grounds that Defendant is and has been domiciled in Los Angeles,
2 California.

3 3. On June 16th, 2023, I submitted the pleadings and redacted exhibits to an outside
4 contractor to assist with the filing of the Motion for Remand in compliance with federal and local
5 rules.

6 4. On June 20, 2023, opposing counsel informed me that Exhibit I of the Motion to
7 Remand still contained exposure as to defendant's birthday.

8 5. I am horrified to discover that despite numerous hours spent drafting the pleadings
9 and redacting the exhibits I inadvertently left certain personal identifying information
10 unredacted. I humbly admit to this oversight and understand this was Plaintiff's second chance to
11 file.

12 6. This will not be a chronic mistake. Going forward, Plaintiff will have all pleadings
13 reviewed by a *second* attorney and engage the services of a seasoned paralegal to review all court
14 filings to ensure compliance with this ruling.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this 20th day of June 2023, in Los Angeles, California.

17 /s/ Jason M. Ingber

18 Jason M. Ingber
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